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Deeds—Construction—Charities.—A clause in a deed, which, after granting a life estate, declared that it was the purpose of the grantor that, after the death of the life tenant, the lands should become and be the property of a certain institution, is held, in *McGarrigle v. Roman Catholic Orphan Asylum* (Cal.) 1 L. R. A. (N. S.) 315, to convey no estate.

Deeds—Construction—Grantee of Partnership.—The naming, as grantee of a partnership the members of which had died, but the name of which had been perpetuated, and the property kept together by consent of all parties interested, is held, in *Walker v. Miller* (N. C.) 1 L. R. A. (N. S.) 157, not to render a deed void.

Action for Enticement.—Hiring at his own request, without notice of the father's objection, a minor who has been hired out by the father to work for another, is held, in *Kenney v. Baltimore & O. R. Co.* (Md.) 1 L. R. A. (N. S.) 205, not to support an action for enticement.

Action for Enticement.—The right of a woman residing with her husband to maintain an action for the enticement of her minor child is denied in *Soper v. Igo, Walker & Chenault* (Ky.) 1 L. R. A. (N. S.) 362.

Personal Injuries—Measure of Damages—Evidence.—Evidence that a boy injured by another's negligence was obedient and economical is held, in *Cameron Mill & E. Co. v. Anderson* (Tex.) 1 L. R. A. (N. S.) 198, to be admissible upon the question of damages.

Negligence—Res Ipsa Loquitur.—Rule res ipsa loquitur is held, in *Ross v. Double Shoals Cotton Mills* (N. C.) 1 L. R. A. (N. S.) 298, not to make a *prima facie* case, or raise a presumption of negligence, but merely to furnish an element to be considered by the jury as a part of the plaintiff's case.

Dying Declarations—Sense of Impending Death.—A deduction that declarations were made under a sense of impending death, without hope of recovery, is held, in *Gipe v. State* (Ind.) 1 L. R. A. (N. S.) 419, to be warranted, although they were made several hours after the statement of the declarant that he did not believe he could get well, he having grown continually weaker in the meantime.

Lost Property.—Property hidden in the earth near a marked tree is held, in *Ferguson v. Ray* (Or.) 1 L. R. A. (N. S.) 477, not to have been lost, so as to vest title in the finder as against the owner of the soil, although it had remained so long as to indicate that the owner was dead or had forgotten it.